

# Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • [emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)

---

April 18, 2025

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Steven I. Locke, U.S.M.J.  
100 Federal Plaza  
Courtroom 820  
Central Islip, NY 11722

**Re: Nelson v. Penn Burgers LLC d/b/a Checkers**  
**Case No.: 2:25-cv-588 (SIL)**

Dear Judge Locke:

This firm represents the Defendant in the above-referenced case. The Defendant writes to respectfully request an extension of time to submit the joint letter required by this Court's Order dated April 10, 2025.

Pursuant to ¶ 2(B) of this Court's Individual Motion Practices, Defendant respectfully submits that:

- (i) the date of the original deadline is today, April 18, 2025;
- (ii) the reason an extension of time is needed is for your undersigned to meet-and-confer with Plaintiff concerning the items raised in the April 10, 2025 Order;
- (iii) Plaintiff has not indicated whether he consents to the requested extension of time because your undersigned has not been able to reach her counsel, who may be observing a holiday;
- (iv) there have been no prior requests for an extension of time to submit the joint letter required by this Court's Order dated April 10, 2025; and
- (v) Defendant submits that good cause has been established by virtue of counsel's need for time to meet-and-confer with Plaintiff;

In light of the foregoing, Defendant respectfully submits that this Court should exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B).

Defendant thanks this Court for its time and attention to this case.

Dated: Jamaica, New York  
April 18, 2025

Respectfully submitted,

**SAGE LEGAL LLC**

By: /s/ Emanuel Kataev, Esq.  
Emanuel Kataev, Esq.  
18211 Jamaica Avenue  
Jamaica, NY 11423-2327  
(718) 412-2421 (office)  
(917) 807-7819 (cellular)  
(718) 489-4155 (facsimile)  
emanuel@sagelegal.nyc

*Attorneys for Defendant  
Penn Burgers LLC d/b/a Checkers*

**VIA ECF**

Slater Slater Schulman LLP  
Attn: John C. Luke, Jr., Esq.  
445 Broadhollow Road, Suite 419  
Melville, NY 11747-3601  
jluke@sssfirm.com

*Attorneys for Plaintiff  
Asia Nelson*